

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PILAR BELENDEZ-DESHA, on behalf of herself
and all others similarly situated,

Plaintiff,

v.

JAF COMMUNICATIONS INC. d/b/a THE
MESSENGER,

Defendant.

CASE NO. 24cv0741 (MMG)

**NOTICE OF MOTION AND JOINT
MOTION FOR SETTLEMENT
APPROVAL**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that Plaintiff Pilar Belendez-Desha (“Plaintiff”), on behalf of herself and the certified class, and Defendant JAF Communications, Inc., d/b/a The Messenger (“Defendant” and collectively, the “Parties”), will and hereby do move this Court, on a date and at such time as may be designated by the Court, at 40 Foley Square, New York, NY 10007, for (1) an order granting preliminary approval of the Parties’ settlement agreement, approving notice, scheduling a fairness hearing, and granting related relief, and (2) after the fairness hearing, an order granting final approval of the settlement and (3) an order entering consent judgment.

In support of the joint motion, the Parties submit the accompanying Memorandum of Law and exhibits thereto, including the settlement agreement, proposed orders for preliminary and final approval, a proposed class notice, and a proposed consent judgment.

DATED: April 25, 2025

By: /s/ Jack A. Raisner
René S. Roupinian
Jack A. Raisner

By: /s/ Louis Pechman
Louis Pechman
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*Attorneys for Defendant JAF
Communications Inc. d/b/a The Messenger*

CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2025, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List below. I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Electronic Mail Notice List:

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Executed on April 25, 2025.

/s/ Jack. A. Raisner

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